



COGEMA

Mining, Inc.

December 27, 2000

**LICENSE SUA-1341
DOCKET NO. 40-8502**

FAXED to:
Elaine Brummett
301 415-5397
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: License Section 10.8 - Comments

Dear Ms. Brummett:

As per your request to Donna Wichers, please note our comments concerning License Section 10.8.

1. Section A needs revised as per Tom Hardgrove's letter request to Mr. King Stablein dated 1-13-99. See attached page 3 and 4 of that document.
2. The first sentence in Section B also needs revised as per Tom Hardgrove's letter request to Mr. King Stablein dated 1-13-99. The second and third sentences should be rewritten to reflect the actual monitoring procedure of the scrubber system during dryer operation. The new wording is as follows:
"This shall be accomplished by use of continuous monitoring equipment which will record the scrubber flow rate and differential pressure, and signal an audible alarm if they fall below the recommended ranges in the permit. Manual readings and alarm checks will be documented once per 12 hour shift."
3. Section C should be rewritten to include the monitoring of the furnace draft pressure. The new wording is as follows:
"The furnace draft pressure shall be read and documented once per 12 hour shift, and maintained within the design specification of - 0.1 to - 0.5 inches of water."

Please contact me if you should have any questions.

Sincerely,

John Vaselin, Radiation Safety Officer

cc: D. Wichers - COGEMA

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satellite plant alone. The operational flow rate for Irigaray is stated in the license renewal application as 2400 gpm. Although we are not currently mining at Irigaray, there are additional uranium reserves present within the licensed area and we do not wish to eliminate this option.

- The condition requires a maximum flow rate. For the past 10 years NRC has allowed us to operate under the auspices of an "annual average" flow rate. The most recent example of this was the last flow increase amendment (No. 47) issued by NRC on July 31, 1997, approving the annual average flow rate of 4000 gpm for Christensen. The concept of "annual average" provides some flexibility in the flow rate so that we are not in violation of the license if we are, for example, operating at 4025 gpm for a short duration instead of 4000 gpm. The periods of flow below 4000 gpm during the year will compensate for those periods of time where we are over the 4000 gpm. We maintain records at the site, for inspection by NRC, that show what the cumulative average flow rate is since the beginning of the year to demonstrate that we are not exceeding 4000 gpm on an annual average. This can be checked for any point in time throughout the year. If we are required to meet a "maximum" criteria, then we will be forced to operate at flow rates that are always below the 4000 gpm, or amend the license for a higher flow rate, because the flows will naturally fluctuate enough that we could inadvertently exceed the 4000 gpm.
- To solve this operational dilemma, we request that NRC delete the term "maximum" and reinstate the term "annual average". We also request that NRC reinstate the ability to operate at Irigaray by addressing its 2400 gpm flow rate (annual average), or providing for a 6400 gpm total annual average flow rate for both properties combined (as has been done with other licensees). This would be consistent with the 2.5 million pounds of yellowcake production addressed in the last sentence of Condition 10.5, which is a total for Irigaray and Christensen combined.

Proposed changes to condition:

"The licensee is authorized to conduct operations at an ~~maximum~~ *annual average* of 4000 6400 gallons per minute, exclusive of restoration flow. Annual yellowcake production shall not exceed 2.5 million pounds."

Condition 10.8**Discussion:**

This condition has been somewhat modified from the Condition 21 of the old license. However, the changes that we asked for in the January 5, 1996 suggested license condition were not incorporated. Concerning item A of the condition, we wanted to remove the term "immediately" and add the words "upon verification" to allow some flexibility in order to determine what is causing a particular problem when noticed or when alarms sound. We also removed the words "design performance" and incorporated "within the ranges permitted by WDEQ Air Quality Permit No. OP-254" because these are our regulatory operating criteria, not the design performance.

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Concerning item B of the condition, we wanted to remove the term "manufacturer's recommended ranges", as we don't have these for all regulatory-required parameters, and we thought it more appropriate to substitute the regulatory criteria of Permit No. OP-254. We would also suggest the elimination of the phrase "achieve design performance" since that phrase is qualitative and not regulatory based. We also recommended the total deletion of item C of the condition since this item is redundant with the requirement in B.

Proposed changes to condition:

"The licensee shall maintain effluent control systems as specified in Section 4.0 of the approved license application, with the following additions:

- A. Operations shall be ~~immediately~~ suspended in the dry/pack area of the plant ~~if any of upon verification that~~ the emission control equipment for the yellowcake drying or packaging areas is not operating within ~~specifications for design performance, or within~~ the ranges permitted by WDEQ Air Quality Permit No. OP-254.
- B. The licensee shall, during all periods of yellowcake drying operations, assure that the scrubber is operating within ~~the manufacturer's recommended ranges in Permit No. OP-254~~ for water flow and air pressure differential ~~necessary to achieve design performance~~. This shall be accomplished by either (1) performing ..." (remainder of B. unchanged).
- ~~C. Air pressure differential gauges for other emission control equipment shall be read and the readings documented once per shift during operations.~~

Condition 10.10

Discussion:

Consistent with the concept of a performance-based license, we feel that the we should have the capability to modify sample locations for air particulates and radon progeny through the SERP.

Proposed changes to condition:

"The licensee shall sample particulates and radon progeny on a monthly frequency at the Irigaray and Christensen Ranch Satellite locations shown on Figures 5.2 and 5.3 of the approved license application. *Any modification of the sample locations shall be accomplished through the SERP process of this performance-based license.*"

Condition 10.14

Discussion:

The second sentence in this condition is the same as that provided in Condition 9.7. It seems to be more appropriate to list this in 9.7 rather than 10.14. We would recommend deleting the second sentence from this condition.